

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RHONDA G. MILLS,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION
AS TRUSTEE FOR THE LEHMAN XS
TRUST, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-4N, et al.

Defendants.

CASE NO.: 1:12-cv-10937-JLT

**PLAINTIFF'S MOTION TO AMEND COUNT 4 OF THE COMPLAINT
TO INCORPORATE HER CLAIM UNDER MASSACHUSETTS GENERAL
LAWS, CHAPTER 93A.**

The Plaintiff has long sought to negotiate and stands ready and willing to honor a loan modification, reinstatement, or other reasonable alternative to the loss of her home. However, given the pending motion to dismiss and the fact that there continues to be no sign of cooperation on the Defendants' part to negotiate such a settlement, she is now compelled to assume that the case will go forward and is requesting that this Honorable Court allow her to incorporate into Count 4 of the complaint her demand pursuant to Massachusetts General Laws chapter 93A, as she has previously reserved the right to do in Count 4 of the complaint. Attached hereto are her demand letter, the Defendant's response, and her reply.

Respectfully submitted,
RHONDA MILLS,
By her attorneys:

/s/Rockwell P. Ludden
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December 13, 2012

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2012 this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to all non-registered participants on this day as well.

/s/ Rockwell P. Ludden

CERTIFICATE OF COMPLIANCE WITH STANDING ORDER

In accordance with the Court's Standing Order issued January 10, 2008 with regard to dispositive motions and oppositions thereto before Judge Tauro, the Plaintiff will within three days of the date set forth above deliver a courtesy copy of this opposition and memorandum of reasons to the Office of the Clerk.

/s/ Rockwell P. Ludden